



COMMUNICATIONS

February 6, 2006

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Cleartel Communications, Cleartel Telecommunications, Inc. f/k/a Essex Acquisition Corp., IDS Telcom Corp., Telecon Communications Corp., nii communications, Ltd., and Cleartel Communications, Inc. f/k/a BiznessOnline.com, Inc.  
Certification of CPNI Filing (February 6, 2006)  
EB Docket No. 06-36  
EB-06-TC-060

Dear Ms. Dortch:

Pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006<sup>1</sup> and the Commission rules concerning telecommunications carriers protection of the privacy of customer proprietary network information ("CPNI"),<sup>2</sup> Cleartel Communications, Cleartel Telecommunications, Inc. f/k/a Essex Acquisition Corp., IDS Telcom Corp., Telecon Communications Corp., nii communications, Ltd., and Cleartel Communications, Inc. f/k/a BiznessOnline.com, Inc. (individually and collectively the "Company") submits this Compliance Statement and Certificate. Protecting CPNI is an important obligation for all telecommunications carriers and the Company has adopted various operational procedures to assure that, consistent with the Commission's rules, all of the CPNI that it holds is protected from unauthorized and illegal use, access and disclosure.

I, hereby certify that I am an officer of the Company with the title of Chief Operations Officer; that I am authorized to execute this certification as an agent for the Company; and that based upon my personal knowledge, I certify that the Company has established operating procedures that are adequate to ensure compliance with the rules of the Federal Communications Commission set forth in 47 CFR §§ 62.2001 through 64.2009. A statement explaining how the operating procedures of the Company ensure that it is in compliance with the rules of the FCC follows.

<sup>1</sup> *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, WC Docket No. 05-196, Public Notice, DA 06-223 (rel. Jan. 30, 2006) ("Public Notice").

<sup>2</sup> 47 C.F.R. § 64.2001, *et seq.*

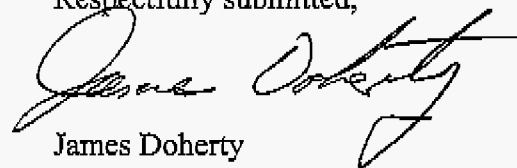
## STATEMENT OF COMPLIANCE WITH CPNI RULES

The Company maintains CPNI in various database and record systems in order to provide telecommunications services to the Company's customers. Each of these systems is protected against unauthorized access. The Company has elected not to utilize or provide CPNI for any purpose other than those purposes that are permissible without customer approval in accordance with 47 C.F.R. § 64.2005. As such, the Company currently does not use CPNI in a manner that requires customer approval and therefore, has not implemented a system by which the status of a customer's CPNI approval can be established prior to the use of CPNI. In the event the Company changes its marketing efforts in a way that requires the approval of customers before using CPNI, the Company will implement policies and procedures and train employees to ensure compliance with all relevant FCC rules.

The Company maintains a record for at least one year of all sales and marketing campaigns that use CPNI. In addition, all outbound marketing campaigns must be approved by the Senior Vice President of Marketing who supervises all of the Company's sales agents and maintains a record of such supervision for at least one year. The Company contractually requires its independent contractor sales agents to maintain the confidentiality of CPNI and to implement protections to ensure the confidentiality of any Company customer's CPNI.

All Company employees who have access to or use CPNI are trained as to when they are and are not authorized to use CPNI. Furthermore, all Company employees are required to execute a Confidentiality Agreement in order to begin employment with the Company. The Confidentiality Agreement requires employees to hold customer information in the strictest confidence and Company employees are prohibited from disclosing such confidential information unless such disclosure is necessary to provide telecommunications services to the Company's customers or otherwise permitted by law. Employees who violate the Confidentiality Agreement will be subject to discipline, including possible termination.

Respectfully submitted,



James Doherty  
Chief Operating Officer  
Cleartel Communications  
Cleartel Telecommunications, Inc. f/k/a  
Essex Acquisition Corp.  
IDS Telecom Corp.,  
Telecon Communications Corp.  
nii communications, Ltd.  
Cleartel Communications, Inc. f/k/a  
BiznessOnline.com, Inc.

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